UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

PATRICIA HARAN,

Plaintiff,

Case No.: 21-cv-10585-VSB

-against-

**DECLARATION OF LIANE FISHER** 

ORANGE BUSINESS SERVICES INC.,

Defendants.

LIANE FISHER hereby declares the following pursuant to 28 U.S.C. §1746:

- I am the attorney for the Plaintiff in the above-captioned action, and as such I am familiar
  with the facts and circumstances of the within action to the extent set forth herein. I
  submit this declaration in support of Plaintiff's opposition to Defendants' motion for
  summary judgment.
- Sales Director Adam Kimmick, an employee of Defendant, was deposed in this matter on October 5, 2023. The transcript of that deposition is attached to Plaintiff's Rule 56.1 Statement as Exhibit A.
- 3. Plaintiff was deposed in this matter on April 26, 2023. The transcript of that deposition is attached to Plaintiff's Rule 56.1 Statement as Exhibit B.
- 4. Plaintiff's responses to Defendant's Interrogatories are attached to Plaintiff's Rule 56.1 Statement as Exhibit C.
- 5. Plaintiff's responses to Defendant's Interrogatories are attached to Plaintiff's Rule 56.1 Statement as Exhibit C.

- 6. Human Resources Representative Michelle Rocco, an employee of Defendant, was deposed in this matter on May 17, 2023. The transcript of that deposition is attached to Plaintiff's Rule 56.1 Statement as Exhibit D.
- 7. Plaintiff's 2020 year-end performance review is attached to Plaintiff's Rule 56.1 Statement as Exhibit E.
- 8. An email regarding Plaintiff's accounts is attached to Plaintiff's Rule 56.1 Statement as Exhibit F.
- 9. An instant message exchange between Plaintiff and her coworker Peter Singh is attached to Plaintiff's Rule 56.1 Statement as Exhibit G.
- 10. An instant message exchange between Plaintiff and her coworker Xavier Pichon is attached to Plaintiff's Rule 56.1 Statement as Exhibit H.

Executed on March 26, 2024
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/s/